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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF PLAINTIFFS' RESPONSE  
TO GOOGLE'S OBJECTIONS TO  
SPECIAL MASTERS ORDER (DKT. 560)**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney  
7 for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt.  
8 560.

9 3. On April 25, 2022, Plaintiffs filed their Administrative Motion to Seal Portions of  
10 Plaintiffs’ Response to Google’s Objections to Special Master Order. On April 25, 2022, I received  
11 an unredacted service copy of these documents.

12 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil  
13 Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document	Basis for Sealing
Plaintiffs’ Response to Google’s Objections to Special Master Brush Report  Pages 2-5	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various types of Google’s internal projects, identifiers, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
Thompson Declaration  Pages 1:19, 1:21, 1:24-26, 2:1-2, 2:6, 2:12, 2:15-17, 2:25, 2:27, 3:18, 3:21, 3:28, 4:2, 4:5-6, 4:12-13, 4:16	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various types of Google’s internal

1		projects, identifiers, data signals, and logs, and their
2		proprietary functionalities, that Google maintains as
3		confidential in the ordinary course of its business and is not
4		generally known to the public or Google's competitors.
5		Such confidential and proprietary information reveals
6		Google's internal strategies, system designs, and business
7		practices for operating and maintaining many of its
8		important services, and falls within the protected scope of
9		the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-
10		3. Public disclosure of such confidential and proprietary
		information could affect Google's competitive standing as
		competitors may alter their systems and practices relating to
		competing products. It may also place Google at an
		increased risk of cybersecurity threats, as third parties may
		seek to use the information to compromise Google's internal
		practices relating to competing products.

11           5.       Google's request is narrowly tailored in order to protect its confidential information.  
12 These redactions are limited in scope and volume. Because the proposed redactions are narrowly  
13 tailored and limited to portions containing Google's highly-confidential or confidential information,  
14 Google requests that the portions of the aforementioned documents be redacted from any public  
15 version of those documents.

16           6.       Google does not seek to redact or file under seal any of the remaining portions of  
17 Plaintiffs' Response to Google's Objections to Special Masters Order and Declaration of  
18 Christopher Thompson not indicated in the table above.

19           I declare under penalty of perjury of the laws of the United States that the foregoing is true  
20 and correct. Executed in San Francisco, California on May 2, 2022.

21  
22 DATED: May 2, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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24  
25 By           /s/ Jonathan Tse            
26 Jonathan Tse  
27 Attorney for Defendant  
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